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** Admitted in DC & PA Only*

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[^]Admitted in DC & WA Only

[#]Admitted in DC & MA Only

June 30, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Limitless Mobile, LLC, Debtor-In-Possession
Study Area Code: 179007
PAPUC Docket No. M-2017-2582564**

Dear Ms. Dortch:

On behalf of Limitless Mobile, LLC, Debtor-In-Possession, and pursuant to Section 54.313 and 54.422 of the Commission's Rules,¹ we are submitting the attached FCC Form 481 – Carrier Annual Reporting Data Collection Form, which is concurrently being filed with the Universal Service Administrative Company and the Pennsylvania Public Utility Commission.

If you have any questions regarding this filing, please contact the undersigned.

Respectfully submitted,

/s/ Robert A. Silverman

Robert A. Silverman
Bennet & Bennet, PLLC

Counsel for Limitless Mobile, LLC, Debtor-in-Possession

Attachments

cc: Pennsylvania Public Utility Commission

¹ 47 C.F.R. §§ 54.313, 54.422

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name: Person USAC should contact with questions about this data | Chuck Huffman |
| <035> | Contact Telephone Number: Number of the person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address: Email of the person identified in data line <030> | chuck.huffman@limitlessmobile.com |
| | Form Type | 54.313 and 54.422 |

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
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| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

No

Page 2

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
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| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

| | | |
|-------|--|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |
| <400> | Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only mobile voice | |
| <410> | Complaints per 1000 customers for fixed voice | |
| <420> | Complaints per 1000 customers for mobile voice 0 . 0 | |
| <430> | Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. | |
| <440> | Complaints per 1000 customers for fixed broadband | |
| <450> | Complaints per 1000 customers for mobile broadband | |

| | | |
|---|--|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |
| <500> | Certify compliance with applicable service quality standards and consumer protection rules | Yes |
| 179007PAServiceQualityStandardsConsumerProtectionRules510.pdf | | |
| <510> | Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance | |
| <515> | Certify compliance with applicable minimum service standards | |

| | | |
|--|--|---|
| (600) Functionality in Emergency Situations | | FCC Form 481 |
| Data Collection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | | July 2013 |

| | | |
|-------|---|------------------------------------|
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| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |
| <600> | Certify compliance regarding ability to function in emergency situations | Yes |
| <610> | Descriptive document for Functionality in Emergency Situations | 179007PAEmergencySituations610.pdf |

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
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| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|--|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |
| <810> | Reporting Carrier | Limitless Mobile, LLC Debtor-in-Possession |
| <811> | Holding Company | Limitless Mobile Holdings, LLC |
| <812> | Operating Company | Limitless Mobile, LLC Debtor-in-Possession |

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select Yes or No or Not Applicable |
|--|
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**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

<1000> Voice services rate comparability certification Yes

179007PAVoiceServicesRateComparability1010.pdf

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP ://limitlessmobile.com/lifeline

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
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| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

| | | |
|-------|---|-----------------------------------|
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| <030> | Contact Name - Person USAC should contact regarding this data | Chuck Huffman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

| | | | |
|---------|--|--|---|
| (3009) | Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii) | | |
| (3010A) | Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)} | | |
| (3010B) | Please Provide Attachment | Name of Attached Document Listing Required Information | <input type="text"/> |
| (3012A) | Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} | | |
| (3012B) | Please Provide Attachment | Name of Attached Document Listing Required Information | <input type="text"/> |
| (3013) | Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} | (Yes/No) | <input type="radio"/> <input type="radio"/> |
| (3014) | If yes, does your company file the RUS annual report | (Yes/No) | <input type="radio"/> <input type="radio"/> |
| | Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: | | |
| (3015) | Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) | | <input type="checkbox"/> |
| (3016) | Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3017) | If the response is yes on line 3014, attach your company's RUS annual report and all required documentation | Name of Attached Document Listing Required Information | <input type="text"/> |
| (3018) | If the response is no on line 3014, is your company audited? | (Yes/No) | <input type="radio"/> <input type="radio"/> |
| | If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: | | |
| (3019) | Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers | | <input type="checkbox"/> |
| (3020) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3021) | Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. | | <input type="checkbox"/> |
| | If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: | | |
| (3022) | Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers | | <input type="checkbox"/> |
| (3023) | Underlying information subjected to a review by an independent certified public accountant | | <input type="checkbox"/> |
| (3024) | Underlying information subjected to an officer certification. | | <input type="checkbox"/> |
| (3025) | Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3026) | Attach the worksheet listing required information | Name of Attached Document Listing Required Information | <input type="text"/> |

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
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| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8138921132 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

| | | |
|-------|---|-----------------------------------|
| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
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| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

| | | |
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| <039> | Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
|---|---|
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: Limitless Mobile, LLC | |
| Signature of Authorized Officer: CERTIFIED ONLINE | Date 06/30/2017 |
| Printed name of Authorized Officer: Charles Huffman | |
| Title or position of Authorized Officer: Vice President of Commercial Operations | |
| Telephone number of Authorized Officer: 8138921132 ext. | |
| Study Area Code of Reporting Carrier: 179007 | Filing Due Date for this form: 07/03/2017 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

| | |
|---|-----------------------------------|
| <010> Study Area Code | 179007 |
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| <039> Contact Email Address - Email Address of person identified in data line <030> | chuck.huffman@limitlessmobile.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--------------------------------|
| I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date: |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--------------------------------|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: | |
| Name of Authorized Agent Firm: | |
| Signature of Authorized Agent or Employee of Agent: | Date: |
| Name of Authorized Agent Employee: | |
| Title or position of Authorized Agent or Employee of Agent: | |
| Telephone number of Authorized Agent or Employee of Agent: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

Attachments

| | |
|---|--|
| (700) Price Offerings including Voice Rate Data Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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| <010> | Study Area Code | 179007 |
| <015> | Study Area Name | Limitless Mobile, LLC |
| <020> | Program Year | 2018 |
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<703>

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**Demonstration of Complying with Applicable
Service Quality Standards and Consumer Protection Rules**

Limitless Mobile, LLC, Debtor-in-Possession (“Limitless”) hereby certifies as to its compliance with applicable consumer protection and service quality standards. In the Federal Communications Commission’s (“FCC”) *2005 ETC Order*, the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers”¹ and that wireless ETCs compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement.”² The sufficiency of other commitments would be considered on a case-by-case basis.³ A commitment to comply with CTIA’s Consumer Code for Wireless Service (“CTIA Code”) will satisfy this requirement for a wireless applicant seeking ETC designation.

Limitless is committed to consumer protection and service quality. Limitless has adopted the CTIA Code and is committed to compliance with CTIA’s Code throughout its service area. Limitless certifies that it has implemented the following practices consistent with the CTIA Code: (1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy. Additionally, Limitless has agreed to cooperate with the Pennsylvania Public Utility Commission’s Bureau of Consumer Service in resolving any consumer complaints.

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46, ¶28 (rel. Mar 17, 2005) (“*2005 ETC Order*”).

² *Id.*

³ *Id.* at n. 71.

Demonstration of Ability to Function in Emergency Situations

Limitless Mobile, LLC, Debtor-in-Possession (“Limitless”) hereby certifies that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations in accordance with the FCC’s rules.¹ Limitless is committed to remaining functional and providing service in emergency situations. Limitless has all critical switching facilities backed up with battery and uninterruptible power supply systems, which enable its core facilities to remain operational for an extended period of time during external power outages. All cell sites have battery back-up facilities which enable Limitless’ network to remain operational for an extended period of time during external power outages. Further, Limitless maintains a number of mobile generators that may be deployed when and where needed. In order to reroute traffic around damaged facilities, and manage traffic spikes resulting from emergency situations, Limitless’ core network traffic routes, including fiber and IP facilities, have full redundancy.

¹ 47 C.F.R. § 54.202(a)(2).

Voice Services Rate Comparability

Limitless Mobile, LLC Debtor-in-Possession (“Limitless”) provides mobile wireless voice and fixed broadband services, and does not provide fixed voice service. Therefore, a description of fixed voice service rate comparability pursuant to 47 C.F.R. § 54.313(a)(10) is not applicable.